

U.S. Environmental Protection Agency, Region 9  
Drinking Water Protection Section, Mail Code WTR-3-2  
C/O Nancy Rumrill  
75 Hawthorne Street, San Francisco, CA 94105  
and by email: [rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)

November 1, 2017

RE: Comment period extension for the draft Underground Injection Control Permit for the Gunnison Project in Cochise County, Arizona

DRAGOON CONSERVATION ALLIANCE \* EARTHWORKS \* AMERIND  
FOUNDATION \* ARIZONA MINING REFORM COALITION

Dear Ms. Rumrill,

The above organizations request a 60 day comment period extension for the Gunnison project for numerous reasons, as well as a public hearing in Cochise County during this comment period.

In-situ operations like the Gunnison Project are extremely technical, and 30 days does not allow the public nearly enough time to evaluate a draft UIC and all the appendices that are included within it. Hydrologic analysis of a project that has taken the EPA years to complete cannot be sufficiently evaluated in a mere 30 days by the public.

The Gunnison Project would become the first commercially producing greenfield copper ISR project in the history of the United States. Given the lack of a track record for this particular ISL approach for copper extraction, more than the usual due diligence is required for those living near the mine site, as well as for civic organizations that take groundwater protection seriously.

We are currently in the process of gathering additional information regarding the project, and using independent expert hydrological expertise to evaluate modeling and assumptions about the project which cannot be ascertained before November 24<sup>th</sup>. Our comments for the Draft UIC permit will be thorough, yet with both Thanksgiving and Christmas Holidays taking time away from this work, we believe a 60 day extension is wholly appropriate.

In addition, a public hearing is request in Cochise County. This hearing is important so that local stakeholders can meet EPA personnel and develop relationships that will last into the project's operation. It's also a much-needed opportunity for technical questions to be answered, and for discussions about permit changes to be addressed with as many stakeholders in attendance as possible.

Thank you for your consideration.